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7 | Attorneys for Defendant
JASON EDWARD THOMAS CARDIFF

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA.

Plaintiff,

vs.

JASON EDWARD THOMAS
CARDIFF,

Defendant.

Case No. 5:23-cr-00021-JGB

**DECLARATION OF STEPHEN G.
LARSON IN SUPPORT OF
MOTION TO WITHDRAW AS
COUNSEL FOR DEFENDANT
JASON CARDIFF**

[Filed concurrently with Motion to Withdraw and [Proposed] Order]

1 **DECLARATION OF STEPHEN G. LARSON**

2 I, Stephen G. Larson, declare as follows:

3 1. I am a partner with Larson LLP, and my firm represents Jason Cardiff
4 ("Cardiff") in this matter. I make this declaration in support of Larson LLP's
5 Motion to Withdraw as counsel for Cardiff.

6 2. On January 31, 2023, an Indictment was filed in the instant matter.
7 (ECF No. 1). The Indictment was unsealed on November 27, 2023. (ECF Nos. 7,
8 11). Shortly thereafter, Cardiff entered into an engagement agreement with Larson
9 LLP to represent him in this matter.

10 3. Beginning in late December 2023, the Government began producing a
11 considerable amount of documents in discovery. To date, the government has
12 produced over 9.2 million documents, consisting of over 21 million pages.

13 4. On April 8, 2024, Cardiff filed a Motion to Dismiss the Indictment.
14 (ECF No. 45). This motion was a significant undertaking by Counsel. Specifically,
15 it required Counsel to review and analyze thousands of documents produced by the
16 Government, conduct extensive legal research, draft a comprehensive oversized
17 motion and reply brief, and prepare for oral argument.

18 5. Since the denial of the Motion in June 2024, Counsel has repeatedly
19 advised Cardiff, including as recently as July 16, 2024, that he is in material breach
20 of the engagement agreement, and that Counsel would file a motion seeking leave to
21 withdraw if Cardiff failed to meet his obligations under the contract. Nevertheless,
22 as of this filing, Cardiff has failed to cure his default under the engagement
23 agreement. Accordingly, at this juncture, there has been an irreconcilable
24 breakdown in the attorney-client relationship which makes continuing representation
25 unreasonably difficult.

26 6. Counsel provided notice to the Government of their intent to move to
27 withdraw on July 15, 2024.

1 Executed on this 17th day of July, 2024, at Los Angeles, California.
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4 /s/ Stephen G. Larson
5 Stephen G. Larson
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